

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 2:23-cv-10394

v.

HON. STEPHEN J. MURPHY

65.08094134 Bitcoin; 247653.48461442
United States Dollar Tether; 9.1345
Ethereum; 25000.461 Unites States
Dollar Tether; 1.00000785 Bitcoin;
0.17972627 Bitcoin; and
27892.00185173 United 247,653.48461442

Defendant *in rem*, and

MARCELO ANTONIO WILSON PORRAS

Claimant.

VERIFIED CLAIM

NOW COMES MARCELO ANTONIO WILSON PORRAS ("Claimant"), by and through undersigned counsel, pursuant to Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions and hereby asserts

a verified claim in the above-captioned civil forfeiture action. Claimant states the following:

Identification of the Property Claimed: Claimant asserts an interest in 247,653.48461442 United States Dollar Tether (USDT) (the "Defendant Property").

Claimant's Interest in the Property: Claimant is the lawful owner of the Defendant Property and has a legitimate interest in said property, which was lawfully obtained through legal and verifiable means. The Defendant Property does not constitute proceeds of, or was not involved in, any unlawful activity under 18 U.S.C. §§ 371, 1956, 1957, or 1960 as alleged by the government.

Source and Lawful Ownership: Claimant asserts that the Defendant Property originated from lawful business activities and financial transactions, and Claimant possesses supporting documentation verifying its legitimate acquisition. Claimant denies any involvement in money laundering, unlicensed money transmitting, or any other unlawful conduct.

Compliance with Rule G(5) Requirements:

This claim identifies the specific property claimed (247,653.48461442 USDT);

This claim identifies Claimant and Claimant's interest in the property; This claim is signed under penalty of perjury as required by Supplemental Rule G(5)(a)(i)(C);

and a copy of this claim is being served on the government attorney of record,
Assistant U.S. Attorney Gjon Juncaj.

WHEREFORE, Claimant respectfully asserts its interest in 247,653.48461442
USDT and demands the return of said property. Claimant reserves all rights and
defenses available under law, including but not limited to **challenging the
government's basis for forfeiture, jurisdiction and seeking dismissal of this
action.**

Dated: March 3, 2025,

Respectfully submitted,

MARCELO ANTONIO WILSON PORRAS



Marcelo Antonio Wilson Porras
Contiguo al Hotel Costa Verde Inn
Casa Blanca a mano derecha, Escazú,
Escazu San José, Costa Rica, 40101
Telephone: (506)72420316

Dated: March 3, 2025

Respectfully submitted,

LAW OFFICES OF ALALEH KAMRAN

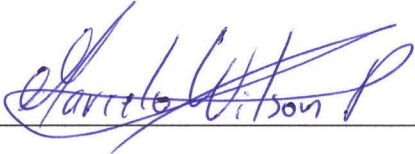
By: Alaleh Kamran

Alaleh Kamran, Esq.
16130 Ventura Boulevard, Suite 320
Encino, CA 91436
Telephone: (818) 986-6222
alalehkamran@alalehkamran.com
California State Bar No. 158648

VERIFICATION

I, MARCELO ANTONIO WILSON PORRAS, hereby declare under penalty of perjury under the laws of the United States that the facts set forth in the foregoing Verified Claim are true and correct to the best of my knowledge and belief.

Executed on this 3rd day of March 2025.

A handwritten signature in blue ink, appearing to read "Marcelo Wilson P", is written over a horizontal line.

MARCELO ANTONIO WILSON PORRAS
Contiguo al Hotel Costa Verde Inn
Casa Blanca a mano derecha, Escazú,
Escazu San José, Costa Rica, 40101
Telephone: (506)72420316

CERTIFICATE OF SERVICE

I hereby certify that on this 3 day of March 2025, a copy of the foregoing Verified Claim was served upon the following by Electronic means through CM/ECF:

Gjon Juncaj
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226

By: Alaleh Kamran
ALALEH KAMRAN
Attorney for Claimant